

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Clearview AI, Inc. Consumer Privacy
Litigation

Case No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

**PLAINTIFFS STEVEN RENDEROS, VALERIA THAIS SUÁREZ ROJAS, REYNA
MALDONADO, LISA KNOX, MIJENTE SUPPORT COMMITTEE, AND NORCAL
RESIST FUND’S OPPOSITION TO THE CALIFORNIA MUNICIPAL DEFENDANTS’
MOTIONS TO STRIKE OMNIBUS REPLY IN SUPPORT OF MOTION TO REMAND**

Plaintiffs Steven Renderos, Valeria Thais Suárez Rojas, Reyna Maldonado, Lisa Knox, Mijente Support Committee, and NorCal Resist Fund (collectively, “Plaintiffs”) respectfully submit this opposition to County of Alameda’s Motion to Strike Plaintiffs’ Omnibus Reply to Motion to Remand Pursuant to Local Rule 78.3 (ECF No. 248), City of Antioch’s Motion to Strike Plaintiffs’ Omnibus Reply to Motion to Remand Pursuant to Local Rule 78.3 (ECF No. 249), and City of El Segundo’s Motion to Strike Plaintiffs’ Reply Brief (ECF No. 250).

In their motions to strike, Defendants County of Alameda, City of Antioch, and City of El Segundo (collectively, “California Municipal Defendants”) argue that Plaintiffs’ omnibus reply in support of its motion to remand is untimely and should therefore be stricken. Each of the California Municipal Defendants’ oppositions to Plaintiffs’ Motion to Remand were improperly filed as separate motions for judicial determination of fraudulent joinder or remand. (ECF Nos. 209, 210, 211.) In these improperly filed motions, the California Municipal Defendants assert the fraudulent joinder defense to Plaintiffs’ Motion to Remand and only in the alternative do they argue for remand back to California state court. (*Id.*) Defendant City of Antioch and Defendant County of Alameda subsequently clarified their motions for judicial determination of fraudulent joinder or remand was in opposition to Plaintiffs’ Motion to Remand. (ECF No. 217 (City of Antioch stating that its Motion for Judicial Determination for Fraudulent Joinder “opposes Plaintiffs’ Motion [to Remand]”), 218 (Alameda County stating the same).)

Plaintiffs timely filed their reply in further support of their Motion to Remand on December 29, 2021. (ECF No. 204.) Plaintiffs’ reply brief contained no new arguments and was wholly responsive to the opposition papers filed by Defendant Clearview AI, Inc. and the California Municipal Defendants. The California Municipal Defendants’ motions to strike and requests to file sur-replies should be denied.

Dated: January 14, 2022

Respectfully submitted,

BRAUNHAGEY & BORDEN LLP



Ellen V. Leonida, Esq. (Admitted *Pro Hac Vice*)
leonida@braunhagey.com

Tracy O. Zinsou, Esq. (Admitted *Pro Hac Vice*)
zinsou@braunhagey.com

Pratik K. Raj Ghosh, Esq. (ARDC: 6326943)
ghosh@braunhagey.com

Amy Senia, Esq. (Admitted *Pro Hac Vice*)
senia@braunhagey.com

BRAUNHAGEY & BORDEN LLP
351 California Street, Tenth Floor
San Francisco, CA 94104
Telephone: (415) 599-0210
Facsimile: (415) 599-0210

Sejal Zota (Admitted *Pro Hac Vice*)
sejal@justfutureslaw.org
JUST FUTURES LAW
95 Washington Street, Suite 104-149
Canton, MA 02021
Telephone: (919) 698-5015

Sheila A. Bedi (ARDC: 6314970)
sheila.bedi@law.northwestern.edu
Community Justice and Civil Rights Clinic
Roderick Macarthur Justice Center
375 E. Chicago Avenue
Chicago, IL 60611
Telephone: (312) 503-2492

*Attorneys for Plaintiffs Steven Renderos, Valeria
Thais Suárez Rojas, Reyna Maldonado, Lisa Knox,
Mijente Support Committee, and NorCal Resist
Fund*